

J. Edward Brooks, State Bar No. 247767  
Michael S. Wilcox, State Bar No. 215269  
Matthew R. Richard, State Bar No. 340084

**GAVRILOV & BROOKS**

2315 Capitol Avenue  
Sacramento, CA 95816  
Telephone: (916) 504-0529  
Facsimile: (916) 727-6877  
Email: ebrooks@gavrilovlaw.com  
Email: mwilcox@gavrilovlaw.com  
Email: mrichard@gavrilovlaw.com

Attorneys for Defendants  
JOHN PAPPAS, III, PM CORPORATE GROUP INC, and  
DOME PRINTING AND PACKAGING, LLC

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

R.R. DONNELLEY & SONS COMPANY,  
a Delaware corporation,

Plaintiff,

vs.

JOHN PAPPAS, III, an individual,  
MERILIZ INC., dba DOME PRINTING,  
PM CORPORATE GROUP INC, DOME  
PRINTING AND PACKAGING, LLC and  
DOES 1-10,  
inclusive,

Defendants.

Case No. 2:21-cv-00753-DJC-AC

**STIPULATION RE MEDIATION,  
REQUEST AND ORDER MODIFYING  
SCHEDULING ORDER AND  
SUSPENDING ALL DATES**

Complaint Filed: April 26, 2021  
Trial Date: January 13, 2025

**STIPULATION RE MEDIATION AND REQUEST TO MODIFY SCHEDULING ORDER  
AND SUSPEND ALL DATES**

On May 9, 2024, at the hearing of Defendants' Motion for Summary Judgment, the Court described the inordinate consumption of judicial resources that this matter entails and, given the Court's extraordinary heavy case load, strongly advised the parties to consider options whereby this matter may be settled. Based on this advice, the parties have agreed in principle to participate in mediation before the Honorable David Ira Brown (Ret.) through JAMS. Tentatively, the parties have agreed that such a mediation could take place on any of the dates of June 24 through 27 or July 17. The final scheduling thereof, subject to the availability of Sherwood Partners, who administrate the assets of Defendant Meriliz, Inc., and whose presence is believed necessary to reach a settlement agreement.

In order to focus their time on mediation efforts and avoid the raising of additional issues that may interfere with the foregoing tentative agreement to mediate, the parties hereby stipulate and request that the Scheduling Order be modified so that all dates, including briefing due dates, hearing dates, associated deadlines, and the trial date be suspended and continued, to be re-scheduled, if necessary, following mediation.

**SO STIPULATED**

Dated: May 17, 2024

**GAVRILOV & BROOKS**

/s/ Michael S. Wilcox

J. Edward Brooks

Michael S. Wilcox

Matthew Richard

Attorneys for Defendants

Dated: May 17, 2024

**GAVRILOV & BROOKS**

/s/ Derek S. Hecht

Mark A. Romeo

Derek S. Hecht

Linde Blocher

Arien Koorn

Attorneys for Plaintiff

1 The Court hereby vacates all pending dates stated in the Scheduling Order, as well as all briefing  
2 due dates, hearing dates, associated deadlines, and the trial date. Such dates are hereby suspended and  
3 continued, to be re-scheduled, if necessary. All past deadlines remain closed and will not be re-opened,  
4 without leave of the Court. The parties are hereby ordered to submit a joint status statement within  
5 forty-five (45) days of the completion of mediation, advising the Court of the status of the case and, if  
6 necessary, proposing the resetting of suspended deadlines.

7  
8 **IT IS SO ORDERED.**

9  
10 Dated: May 17, 2024

/s/ Daniel J. Calabretta

11 THE HONORABLE DANIEL J. CALABRETTA  
12 UNITED STATES DISTRICT JUDGE  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28